

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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AMYIAH COHOON, a minor, by and through her parents  
and legal guardians, RICHARD COHOON and ANGELA  
COHOON,

Plaintiff,

Case No. 20-

v.

JOSEPH KONRATH, in his personal and official capacity  
as Sheriff of Marquette County, Wisconsin, and

CAMERON KLUMP, in his personal and official capacity  
as Patrol Sergeant for the Marquette County Sheriff's  
Office

Defendants.

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**DECLARATION OF AMYIAH COHOON**

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I, Amyiah Cohoon, declare that, if called upon, I could and would competently testify to  
the following:

1. I am a sophomore at Westfield Area High School in Westfield, Wisconsin.
2. Between March 7 and March 15, I went on a spring break trip to Disney World and  
Universal Studios in Florida with my high school's band class.
3. We returned in the morning on March 15, which was earlier than planned, due to  
closures in Florida from the COVID-19 pandemic.
4. I began feeling sick four or five days after I returned from the trip, including a fever  
and dry cough.

5. On March 22, I was having difficulty breathing, so my mom took me to the emergency room at Divine Savior Hospital in Portage, Wisconsin.

6. The doctors there told me that my symptoms matched COVID-19, but that they could not test me. They sent me home with an inhaler and told me to self-quarantine and return if my symptoms got worse.

7. After I got home from Divine Savior, I posted to Instagram a picture of myself from the spring break trip with the caption, "Hey guys... sorry I've been on a long break.. I won't be back for a while longer due to me not having the COVID-19 virus... I don't want the attention it's just the truth... I am now in self quarantine and am not allowed to leave my room and have an inhaler since they said to go home... best of wishes. love you guys."

8. I was quarantined at home from March 22 until March 25. I stayed in my bedroom and used only the closest bathroom.

9. On March 25, my symptoms got much worse, and I had significant difficulty breathing, so my mom took me back to Divine Savior. They took me from there in an ambulance to the UW Children's Hospital in Madison.

10. I posted a short update on Instagram that I was "in the ER might need to stay..."

11. I was finally tested for COVID-19 at the UW Children's Hospital that evening, and the results came back the following morning.

12. The test came back negative, but the doctors told me that I still likely had COVID-19 and had missed the window for testing positive.

13. I believed and still believe the doctors that my symptoms were likely caused by COVID-19.

14. After a night in Madison, I returned home from the hospital on March 26.

15. After I got home, I posted on Instagram a picture of myself at the hospital with an oxygen mask on my face, with the caption, “I am finally home after being hospitalized for a day and a half. I am still on breathing treatment but have beaten the coronavirus. Stay home and be safe.”

16. A day later, on March 27, an officer from the Marquette County Sheriff’s Office came to my home. I answered the door, and he asked to speak to my dad. I went inside while he and my dad spoke.

17. A little while later, my dad called me back outside and explained that the officer was going to ask me to remove an Instagram post. My dad said I did not have to delete my post, and that he wouldn’t delete it if it were his post, but he would let me decide.

18. The officer then showed me a screenshot of one of my Instagram posts and told me that if I did not remove it, he had direct orders from the Sheriff to begin issuing citations for disorderly conduct and taking people to jail.

19. I was afraid that the officer would do what he said, so I agreed to delete my post. After I deleted it, I showed the officer my Instagram account on my phone so he could see that it had been removed.

20. The officer then left.

21. After he left, I was afraid that he would find my first post and come back for that one, so I deleted that post too.

22. Later that evening, I learned that the administrator of my school district sent around a news update stating that my posts were not true and were “a foolish means to get attention.”

23. Because of these accusations, I am now afraid to return to school for fear of what my classmates and teachers will think about me.

24. I would like to respond to and correct those accusations on social media, but I am afraid to do so in light of the officer's threats.

25. I would also like to post further about my scare with COVID-19 on social media, and to repost the posts I removed, but I am afraid that another officer will come to my home and cite or arrest my parents or me.

26. I understand that my lawyer sent a letter to the Sheriff on my behalf, but the Sheriff refused to admit that my First Amendment rights were violated or that my speech was protected, which reinforces my fear that I will be retaliated against again if I post further about my experience on social media.

27. Since the officer came to our home, I have not posted anything on social media about my experience or responded to the district administrator's statements about my prior posts.

28. I did speak with a reporter who had questions about what happened to me, but I did not understand that to be inconsistent with the officer's demand to remove social media posts about my experience. My conversation with a reporter also occurred before I was aware of Sheriff Konrath's response.

I declare under penalty of perjury that the foregoing is true and correct to best of my knowledge and that this Declaration was executed on April 15, 2020 in Marquette County, Wisconsin.

/s/ Amyiah Cohoon  
Amyiah Cohoon